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November 14, 2007

Mr. Marcos Ronquillo
Mr. Jose Gonzalez
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1201 Elm Street, Suite 1700
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Via Email

Mr. William Cremer
Mr. Josh Yeager
Cremer, Kopon, Shaughnessy
180 North LaSalle, Suite 3300
Chicago, IL 60601
Via Email

RE: Sacks v. Four Seasons

Gentlemen:

Attached is Plaintiffs' Designation of Expert Witnesses. Also attached are the reports and CV's of Fred Del Marva, J. Jon Fels, Ronald Underwood, M.D. and Thomas Mayor.

Thank you.

With kind regards,

/s/

Windle Turley

WT/bl
Attachments
cc: Mr. Winford Dunn



Holly Ann Sacks, et al

-vs-

Four Seasons Hotels Limited and Four Seasons Punta Mita, S.A. de C.V.

A. DEPOSITION / DEPOSITION SUMMARIES

Reviewed by Joachim 'Jon' Fels, Expert Witness

FOUR SEASONS HOTELS LIMITED ET AL

- Senior Vice President of Operations & Development
Mr. Charles Ferraro
- Vice President of Rooms
Mr. Ivan Goh
- Risk Manager
Ms. Leslie Brown
- General Manager (September, 1999-October, 2003)
Mr. Ricardo Acevedo
- General Manager (November 1, 2003 – 05,...after Mr. Sacks' death)
Christian H. Clerc

FOUR SEASONS HOTEL PUNTA MITA / SABB

- Resort Manager
Mr. Martin Rhomberg
 - Director of Rooms
Ms. Nancy Chacon
 - Asst. Manager of Security (Oral Sworn Statements)
Sergio Farias
 - PBX/Receptionist (Oral Sworn Statements)
Ms. Mariana Zardain
-

- Holly Ann Sacks, wife of deceased
Richard Todd Sacks

Joachim 'Jon' Fels
Expert Witness

B. REVIEW OF REPORTS RECEIVED

- Plaintiff's Original Complaint
- Agreed Protective Order
- Agreement to be bound by Agreed Protective Order (6/1/07)
- Hotel Management Agreement (113 pages) and
- Hotel Advisory Agreement (118 pages) between
Four Seasons Corporate & Punta Mita
- Worldwide Four Seasons Directory (135 pages)
- Operating Criteria (152 pages)
- Table of Contents: Security Guidelines for Rooms Division Policy &
Procedures (13 pages)
- Corporate Security Policies and Procedures (effective 4/1/06)
- Local Security Policies and Procedures (2006/07)
- Guest Injury Response and Reporting Procedures
- Code Blue (in Spanish and preliminary translation into English)
- Lock Event Interpretation (Sacks' suite #1404) 6/6/03-6/8/03
- Prescription for Valium